

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

HAWAII CARPENTERS TRUST) CIVIL NO. CV02-00425 DAE BMK
FUNDS, (Health & Welfare Fund)
by its trustees Albert) DECLARATION OF LEANNE
Hamamoto, Audrey Hidano,) KUNIHISA; EXHIBIT "A"
Henry Iida, Glen Kaneshige,)
Thomas Toma, Daniel Tom,)
Elmer Cabico, Paul C.K. Chang,)
Ronald Taketa, Melvin Fujii,)
Clifford Resacio, Russell Young)
and Keith Hirota;)
Apprenticeship & Training Fund)
by its trustees James Ramirez,)
Russell Ogata, Conrad)
Murashige, Robert Donle,)
Angela Chinen, Dante Agra,)
Ron Taketa, Sidney Shimokawa,)
Dean Takahashi and Russell)
Hiranaka; *Vacation & Holiday)*
Fund by its trustees James)
Watanabe, James Ramirez,)
Gerard Sakamoto, Paul Sasaki,)
Jiggs Tamashiro, Mark Erwin,)
Michael Spain, Jr., Rockwell)
Rogers, Jr., Curtis Kern, Patrick)
Borge, Sr. and Lloyd Kupau,)
Jr.; *Market Recovery Program* by)
its trustees Edmund Aczon,)
Thalia Choy, Steven Hidano,)
Claude Matsumoto, Gerard)
Sakamoto, Albert Belliveau,)
Michael Spain, Jr., Ronald)
Taketa, Glenn Young and Jason)
Orita; *Financial Security Fund)*

by its trustees Kenneth)
Sakurai, Gordon L. Scruton,)
James Watanabe, Conrad)
Murashige, Lance Wilhelm,)
Brian Hedge, Rockwell Rogers,)
Jr., Bruce Soileau, Ronald)
Taketa, Tim McCormack,)
Kenneth Spence, Jack Reeves)
and Ralph Yackley),)
)
Plaintiffs,)
)
vs.)
)
DYNAMIC INTERIORS, INC., a)
Hawaii corporation,)
)
Defendant.)
)

DECLARATION OF LEANNE KUNIHISA

Leanne Kunihiisa hereby declares as follows:

1. She is a Contribution Accountant for Hawaii Benefit Administrators, Inc., which is the administrative office for Plaintiff Trustees of the Hawaii Carpenters Trust Funds ("HCTF"). In such capacity, she is responsible for administering, supervising and collecting the amounts due and owing to HCTF under the Collective Bargaining Agreement executed by Defendant Dynamic Interiors, Inc. ("Dynamic") on or about November 20, 1997 ("CBA"), and

referred to in Plaintiff's Motion for Entry of Default Judgment
Against Defendant Dynamic Interiors, Inc., filed on March 1, 2006
("HCTF's Motion").

2. She has personal knowledge of the matters
hereinafter stated and does hereby make this declaration in support
of HCTF's Motion.

3. In her capacity as Contribution Accountant, she has
in her custody, control and possession, records of HCTF, which
document the payment history and amounts due and owing under
and in connection with the CBA in this case; such records were
made by HCTF in the course of the regularly conducted activities of
HCTF including keeping track of such payments and amounts due
and owing under the CBA; such records were made at or near the
times when the required payments under the CBA were received,
and when such payments were not received; such records were also
made at or near the time it was necessary to determine the amounts
due and owing under the CBA for the purposes prosecuting this
action and supporting HCTF's Motion;

4. HCTF received Dynamic's payment of \$2,881.60 on March 20, 2006. However, Dynamic remains delinquent under the terms of said CBA in that it has failed to pay the amount owed to HCTF of \$110,674.88, inclusive of liquidated damages, audit fees and interest with interest following judgment at a per annum rate of twelve percent (12%) based on the CBA until satisfaction of judgment and is reflected in the amortization table attached hereto as Exhibit "A."

5. The records with regard to the CBA and payments in accordance therewith above described are kept by HCTF's officers in the ordinary course of business under their custody and control in the ordinary course of business show that the amounts due and owing under the CBA of \$110,674.88 are as follows:

Contributions:	\$35,565.84
Liquidated Damages:	\$74,258.06
Interest (12%)	\$460.98
Audit Fees:	\$390.00

6. The interest is based on the terms of the CBA and is at the rate of twelve percent (12%), calculated from the due date to the date of receipt of payment.

7. Our office's internal auditors have met with Dynamic on numerous occasions to clarify and determine the monies due and owing based on the CBA. Dynamic has always claimed that their payments have not been properly credited. HCTF denies these claims and further notes that it has conducted numerous audits and only Dynamic has maintained this claim even when presented with evidence to the contrary.

I, Leanne Kunihisa, declare under penalty of law that the foregoing is true and correct.

Dated: Honolulu, Hawaii, April 10, 2006.

/s/ Leanne Kunihisa
LEANNE KUNIHISA